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7  
8 IN THE UNITED STATES DISTRICT COURT  
9  
10 EASTERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 APPROXIMATELY \$37,000.00 IN  
U.S. CURRENCY,

15 Defendant.

16 2:20-MC-00281-KJM-KJN

17 STIPULATION AND ORDER EXTENDING TIME  
18 FOR FILING A COMPLAINT FOR FORFEITURE  
19 AND/OR TO OBTAIN AN INDICTMENT  
20 ALLEGING FORFEITURE

21 It is hereby stipulated by and between the United States of America and potential claimant Hong  
22 Tran (“claimant”), by and through their respective counsel, as follows:

23 1. On or about September 2, 2020, claimant filed a claim in the administrative forfeiture  
24 proceeding with the United States Postal Inspection Service (“USPIS”) with respect to the Approximately  
25 \$37,000.00 in U.S. Currency (hereafter “defendant currency”), which was seized on July 23, 2020.

26 2. The USPIS has sent the written notice of intent to forfeit required by 18 U.S.C. §  
27 983(a)(1)(A) to all known interested parties. The time has expired for any person to file a claim to the  
28 defendant currency under 18 U.S.C. § 983(a)(2)(A)-(E), and no person other than claimant has filed a claim  
to the defendant currency as required by law in the administrative forfeiture proceeding.

29 3. Under 18 U.S.C. § 983(a)(3)(A), the United States is required to file a complaint for  
30 forfeiture against the defendant currency and/or to obtain an indictment alleging that the defendant currency  
31 is subject to forfeiture within ninety days after a claim has been filed in the administrative forfeiture

1 proceeding, unless the court extends the deadline for good cause shown or by agreement of the parties.  
2 That deadline was December 1, 2020.

3       4. By Stipulation and Order filed November 20, 2020, the parties stipulated to extend to  
4 February 1, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
5 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject  
6 to forfeiture.

7       5. By Stipulation and Order filed January 27, 2021, the parties stipulated to extend to March  
8 3, 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
9 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
10 forfeiture.

11       6. By Stipulation and Order filed March 2, 2021, the parties stipulated to extend to May 3,  
12 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
13 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
14 forfeiture.

15       7. By Stipulation and Order filed April 29, 2021, the parties stipulated to extend to July 2,  
16 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
17 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
18 forfeiture.

19       8. By Stipulation and Order filed June 30, 2021, the parties stipulated to extend to August 2,  
20 2021, the time in which the United States is required to file a civil complaint for forfeiture against the  
21 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to  
22 forfeiture.

23       9. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to  
24 September 1, 2021, the time in which the United States is required to file a civil complaint for forfeiture  
25 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject  
26 to forfeiture.

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1       10. Accordingly, the parties agree that the deadline by which the United States shall be required  
2 to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment alleging that  
3 the defendant currency is subject to forfeiture shall be extended to September 1, 2021.

4 Dated: 7/30/21

PHILLIP A. TALBERT  
Acting United States Attorney

5 By: /s/ Kevin C. Khasigian  
6 KEVIN C. KHASIGIAN  
7 Assistant United States Attorney

8 Dated: 7/30/21

9 /s/ Geoffrey G. Nathan  
10 GEOFFREY G. NATHAN  
11 Attorney for potential claimant  
12 Hong Tran  
13 (Signature authorized by email)

14       The stipulated request is granted. The court does not anticipated granting any further  
15 requests for extensions of time without a showing of good cause.

16       **IT IS SO ORDERED.**

17       DATED: August 5, 2021.

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20       CHIEF UNITED STATES DISTRICT JUDGE  
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